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Cascade Sierra Solutions (CSS) supports the use of carbon allowances to reduce greenhouse gas emissions. These allowances have the potential of raising billions of dollars to help address the problem.

CSS does not agree with the proposed structure to give free allowances to producers until 2015 based on the amount petroleum they produce is subsidizing the oil industry.

If the goal is to reduce carbon emissions, we need to capture the full cost of the fuels in the price and use the proceeds fees imposed to mitigate the environmental damage and health hazards caused from their use.

Cascade Sierra Solutions is actively reducing the use of fossil fuels through promoting energy efficiency in the freight industry.

Giving free allowances to refineries is taking a step backwards.

Wouldn't it be a better plan to auction all allowances and use the proceeds to help businesses conserve fuel?

There are many solutions that can be implemented but the barriers for most small businesses are overwhelming in this economy. Even though there is a Return on Investment, most businesses do not have the access to capital to upgrade or replace their equipment to achieve better fuel efficiency.

The auction of these allowances could provide a source of capital for implementing efficiency measures for our small businesses which, unlike large oil companies, have no ability to set prices for their products and services.

CSS supports the Cap & Trade legislation with the exception of this element.

Sincerely,

Sharon Banks
CEO

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